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9 Attorney for Defendant

10 HARTFORD LIFE AND ACCIDENT INSURANCE
COMPANY

11 VIRGINIA ROLLINS,

12 Plaintiff,

13 v.

14 HARTFORD LIFE AND ACCIDENT
INSURANCE COMPANY,

15 Defendant.

16 Case No. 2:22-cv-00969-JCM-NJK

17 STIPULATION AND ~~(PROPOSED)~~
ORDER TO EXTEND TIME FOR
DEFENDANT TO FILE RESPONSE TO
COMPLAINT

18 [SECOND REQUEST]

19 Plaintiff Virginia Rollins and Defendant Hartford Life and Accident Insurance Company, by
20 and through their attorneys of record, stipulate to extend the time for Defendant to file a response to
21 the Complaint from the current deadline of August 29, 2022, for two weeks, up to and including
22 September 12, 2022.

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1 The requested extension is necessary in light of the fact that Defendant's counsel is still working
2 on conducting its investigation into the allegations as necessary to prepare a response to the Complaint.

3 This is the second request for an extension of time to respond to the Complaint. This request is
4 made in good faith and not for the purpose of delay.

5 Dated: August 26, 2022

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7 Dated: August 26, 2022

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9 /s/ *Martina B. Sherman, Esq.*

10 JULIE A. MERSCH, ESQ.
11 LAW OFFICES OF JULIE A. MERSCH

12 MARTINA B. SHERMAN, ESQ.
13 DEBOFSKY LAW, LTD.

14 Attorneys for Plaintiff
15 VIRGINIA ROLLINS

16 _____
17 /s/ *Amy L. Thompson, Esq.*

18 AMY L. THOMPSON, ESQ.
19 LITTLER MENDELSON

20 Attorney for Defendant
21 HARTFORD LIFE AND ACCIDENT
22 INSURANCE COMPANY

23 **IT IS SO ORDERED.**

24 Dated: August 29, 2022

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26 
27 UNITED STATES MAGISTRATE JUDGE

28 4857-9294-6224.1 / 116071-1003